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Attorney for Defendant Mark Alan Kountz

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 08cr0511-BEN
)	
Plaintiff,)	JOINT MOTION AND
)	STIPULATION
v.)	REGARDING MODIFICATION OF CONDITIONS
)	OF PRETRIAL RELEASE
)	
)	
MARK ALAN KOUNTZ,)	
)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED by and between the Plaintiff, the United States of America,
by and through its counsel, Karen P. Hewitt, United States Attorney, and Timothy F. Salel, Assistant United
States Attorney, and the defendant, Mark Alan Kountz, by and through his attorney, Casey Donovan, Esq.,
that the following conditions of pretrial release, as set by this court on March 14, 2008, are modified:

It was ordered that the defendant's travel during pretrial release shall be confined to the

Southern District of California. Mr. Kountz needs to travel as part of his employment, and also to attend long planned family function in the state of Pennsylvania. Thus the parties agree to expand his travel conditions permit Mr. Kountz to travel anywhere within the entire United States.

Counsel has spoken to Brian Kountz by telephone and he has agreed to remain the surety in this case with the full understanding that he may now travel anywhere in the United States during the period of pre trial release. He has given counsel permission to electronically sign his name to this motion. Brian Kountz is presently traveling for work purposes in Australia, and will not be returning to the United States until May 8, 2008. Counsel has also spoken to the defendant, Mark Kountz, who also acknowledges that his bond has been modified to permit him to travel anywhere within the United States, and has given permission to electronically sing his name to this motion. Counsel has also spoken to assistant United States Attorney, Timothy F. Salel and informed him of counsel's conversations with both Brian Kountz, the surety, and Mark Kountz, the defendant, and agrees to their signatures appearing electronically on this motion.

IT IS SO STIPULATED AND AGREED..

Dated 4/28/08

S/ Casey Donovan

CASEY DONOVAN

Attorney for defendant Mark Alan Kountz

Dated 4/28/08

S/ Mark Alan Kountz

MARK ALAN KOUNTZ

Defendant

Dated 4/28/08

S/ Brian Kountz

BRIAN KOUNTZ

Surety

Dated: 4/28/08

S/ Timothy F. Salel

TIMOTHY F. SALEL

Assistant United States Attorney

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U.S.D.C. No.08-CR-0511-BEN

DECLARATION OF SERVICE

I, undersigned, say: I am over 18 years of age, employed in the County of San Diego, California, in which county the within mentioned delivery occurred, and not a party to the subject cause. My business address is 105 West F. Street, San Diego, California. I served the Defendant's Joint Motion and Stipulation to modify conditions of bond to permit travel, of which a true and correct copy of the documents filed in this cause is affixed, by electronic filing to:

Timothy F. Salel, Assistant U.S. Attorney
Office of the United States Attorney
880 Front Street, Room 6293
San Diego, CA 92188

The electronic filing was done by me at San Diego, California, on April 28, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 28, 2008 at San Diego, California.

s/ Casey Donovan

Casey Donovan